



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

December 24, 2015

Re: Dovetail Energy, LLC
Class B Biosolids Site Authorization
NPDES
Greene County
11N00305*AD

Mr. Bruce Bailey
Vice President of Technical Affairs
quasar energy group
5575 Granger Road, Suite 320
Independence, OH 44131

Dear Mr. Bailey:

Ohio EPA received a request on November 2, 2015 from quasar energy group to include the following sites as part of the Dovetail Energy, LLC biosolids management program:

<u>Field ID</u>	<u>Ohio EPA #</u>	<u>County</u>	<u>Township</u>
GRQ-02-01	29-00467	Greene	Bath
GRQ-02-02	29-00468	Greene	Bath

These sites, owned by **Exemption 6** and operated by Pitstick Pork Farms, Inc., are located east of the intersection of Herr Road and State Route 235.

Ohio EPA has reviewed these sites and noted the conditions listed below. The review included consideration of soil and landscape characteristics, isolation distances from residences, geology and ground water conditions, and the proximity to waterways and wells.

- The soil analytical result for Ohio EPA Site 29-00467 indicates a soil phosphorus of 65 ppm Mehlich III extraction. Ohio Administrative Code (OAC) 3745-40-08(A)(2)(b) requires that for soils with phosphorus test results greater than 45 ppm Mehlich III and less than or equal to 115 ppm Mehlich III, the agronomic rate shall be the most limiting factor derived from the nitrogen agronomic rate or the multi-year phosphate agronomic rate.
- If a dragline system is used at these sites, it shall be managed in accordance with the Dovetail Energy Dragline Standard Operating Procedure submitted to Ohio EPA on June 19, 2015.
- **All biosolids beneficially used at these sites shall be injected beneath the surface of the ground or immediately incorporated into the soil.** Additional isolation distance to surface waters of the state may need to be provided to account for potential runoff and to ensure that the required thirty-three feet isolation distance is maintained. Biosolids that remain on the surface shall be incorporated within six hours to minimize the potential for runoff.

These sites are authorized to be included as part of the Dovetail Energy, LLC biosolids program. This authorization is subject to conditions listed above and those contained in both the NPDES permit and OAC 3745-40. Conditions contained in the NPDES permit and OAC 3745-40 may differ. In such cases, the

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more restrictive conditions from either the NPDES permit or OAC 3745-40 shall govern. Highlights of these conditions are as follows:

1. Biosolids shall not be applied in buffer zones.
2. In accordance with federal/state rules, biosolids may not be applied within 33 feet of surface waters of the state.
3. Biosolids application shall be timed to avoid periods of excessive wetness to help prevent runoff from a site.
4. Records for the application of biosolids on these sites shall be maintained in accordance with the requirements found in OAC 3745-40-09(C).

If you have any questions, please contact me at (614) 644-2150 or via email at betsy.vanwormer@epa.ohio.gov.

Sincerely,



Betsy P. L. VanWormer, P.E.
Environmental Engineer II
Ohio EPA Division of Surface Water

Cc: Greene County Combined Health District
Greene County Soil and Water Conservation District
Bath Township Trustees
Exemption 6

Ec: Pitstick Pork Farms
Ned Sarle, Ohio EPA, DSW/SWDO



Class B Biosolids
Beneficial Use Site Authorization

Dovetail Energy, LLC

Ohio EPA Site	Field ID
29-00467	GRQ-02-01
29-00468	GRQ-02-02



Division of Surface Water
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